

Message

From: Dawson, Jeffrey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B7281288675C408D9667266072F0AE21-JEFFREY DAWSON]
Sent: 5/4/2021 6:15:12 PM
To: Leifer, Kerry [Leifer.Kerry@epa.gov]
Subject: RE: OCSPP/OECA PFAS Check-In - 3/30/2021
Attachments: PFAS PMN Exemptions Petition 04-27-2021.pdf

Jeffrey L Dawson
Senior Science Advisor
Immediate Office
U.S. EPA, Office of Chemical Safety and Pollution Prevention
1200 Pennsylvania Ave NW (7101M)
Washington, DC. 20004
703-305-7329
Email: dawson.jeff@epa.gov
Deliveries: 1201 Constitution Ave NW, Washington, DC 20004

From: Leifer, Kerry <Leifer.Kerry@epa.gov>
Sent: Tuesday, May 04, 2021 2:14 PM
To: Dawson, Jeffrey <Dawson.Jeff@epa.gov>
Subject: FW: OCSPP/OECA PFAS Check-In - 3/30/2021

Kerry Leifer, Chief
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460
tel: (703) 308-8811
fax: (703) 605-0781

e-mail: leifer.kerry@epa.gov

From: Nesci, Kimberly
Sent: Tuesday, March 30, 2021 4:49 PM
To: Messina, Edward <Messina.Edward@epa.gov>; Henry, Tala <Henry.Tala@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Qian, Yaorong <qian.yaorong@epa.gov>; Teter, Royan <Teter.Royan@epa.gov>; Saenz, Diana <Saenz.Diana@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Dennis, Allison <Dennis.Allison@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>; Charlton, Tom <Charlton.Tom@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>; Garvey, Mark <Garvey.Mark@epa.gov>; Miles, James <miles.james@epa.gov>; Odusote, Gloria <odusote.gloria@epa.gov>; O'Neill, Sandra <O'Neill.Sandra@epa.gov>; Butler, Tristan <Butler.Tristan@epa.gov>; Schmit, Ryan <schmit.ryan@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>;

Wolf, Joel <Wolf.Joel@epa.gov>; Kaczmarek, Chris <Kaczmarek.Chris@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>; Leifer, Kerry <Leifer.Kerry@epa.gov>; Widawsky, David <Widawsky.David@epa.gov>; Helfgott, Daniel <Helfgott.Daniel@epa.gov>; Huskey, Angela <Huskey.Angela@epa.gov>; Williamson, Tracy <Williamson.Tracy@epa.gov>

Subject: RE: OCSPP/OECA PFAS Check-In - 3/30/2021

And, info on PFAS definition. Thanks, Shamus!

From: Dunton, Cheryl <Dunton.Cheryl@epa.gov>

Sent: Tuesday, March 30, 2021 12:32 PM

To: Conger, Nick <Conger.Nick@epa.gov>

Cc: Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Drinkard, Andrea <Drinkard.Andrea@epa.gov>

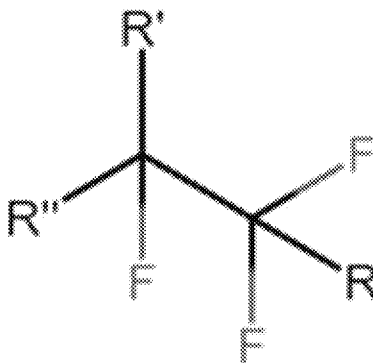
Subject: Follow-up from Pat R. interview last week: Definition of PFAS

Hi Nick – as a follow-up to the interview we did with Pat R. on PFAS and containers last week, we told Pat we'd get her our working definition of PFAS. Here's our working definition. Let me know if you need anything else. Thanks.

RESPONSE: There is currently no universally accepted definition for PFAS, but there is an ongoing international effort via OECD and WHO to create one. EPA's Office of Pollution Prevention and Toxics applies the following "working definition" when identifying PFAS on the TSCA Inventory: a structure that contains the unit $R-CF_2-CF(R')(R'')$, where R, R', and R'' do not equal "H" and the carbon-carbon bond is saturated (note: branching, heteroatoms, and cyclic structures are included).

PFAS "Working" Definition

- Per- and polyfluoroalkyl substances (PFAS) is a broad category that includes perfluoro polymers, PFOA, PFOS, GenX and many other chemical substances
- There is no universally accepted definition.
- OPPT applies the following "working" definition when identifying PFAS on the TSCA inventory:
 - Structure that contains the unit $R-CF_2-CF(R')(R'')$ where R, R', and R'' do not equal "H"
 - Carbon-carbon bond is saturated
 - Branching, heteroatoms, and cyclic structures are included



From: Nesci, Kimberly

Sent: Tuesday, March 30, 2021 4:46 PM

To: Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Henry, Tala <Henry.Tala@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Qian, Yaorong <qian.yaorong@epa.gov>; Teter, Royan <Teter.Royan@epa.gov>; Saenz, Diana <Saenz.Diana@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Dennis, Allison <Dennis.Allison@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>; Charlton, Tom <Charlton.Tom@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>; Garvey, Mark <Garvey.Mark@epa.gov>; Miles, James <miles.james@epa.gov>; Odusote, Gloria <odusote.gloria@epa.gov>; O'Neill, Sandra <ONeill.Sandra@epa.gov>; Butler, Tristan <Butler.Tristan@epa.gov>; Schmit, Ryan <schmit.ryan@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Koch, Erin <Koch.Erin@epa.gov>; Wolf, Joel <Wolf.Joel@epa.gov>; Kaczmarek, Chris <Kaczmarek.Chris@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>; Leifer, Kerry <Leifer.Kerry@epa.gov>; Widawsky, David <Widawsky.David@epa.gov>; Helfgott, Daniel <Helfgott.Daniel@epa.gov>; Huskey, Angela <Huskey.Angela@epa.gov>; Tracy Williamson <Williamson.Tracy@epa.gov> <Williamson.Tracy@epa.gov>
Subject: OCSPP/OECA PFAS Check-In - 3/30/2021

Notes from this evening's call – thanks, all!

Link to meeting notes: [OCSPP/OECA PFAS Check-In - 3/30/2021 \(Web view\)](#)

OCSP/PECA PFAS Check-In - 3/30/2021

Tuesday, March 30, 2021
3:19 PM

Meeting Date: 3/30/2021 4:00 PM

Location: Microsoft Teams Meeting

Link to Outlook Item: [click here](#)

Invitation Message

For 3/30/2021 meeting:

- Updates on lab testing (OPP)
 - ACB
 - Instrument fixed last week; running method validation for oil product; checking results - look really good. Consistent. Putting the data together; should have method finalized. Draft for review: QA - another couple of weeks for QA. Some modifications from the original method. Yan re-running one of the anvil samples with the new method - 2-3 weeks because of the change.
 - Leaching test - started a leaching test this week. Will collect samples every week and then every month for 3-4 month time period. Using water & methanol - worst case.
 - Still exploring methods for different types of pesticide matrices to test products Mass shared - no good method yet, but once we have something we'll proceed with the split samples rec'd from Region 1 (Mass).
 - ACB Reviewing data from Clarke submitted to RD on the new container. Not fluorinated. Rinsate testing.
 - ACB testing the same container that Clarke is proposing to change to; results consistent.
 - Our thoughts on PEER data - Permanone 30-30
 - Some questions - presence of GENX compound
 - Article mentioned that product is in a metal container that has PFAS, this is suspect?
 - Rec'd actual data submitted and referenced in the article

- Lots of questions on the data
 - PFOA reported at 3500 ppt (3x higher than reporting limit) - could be background interference
 - Other reported amounts are half of the reporting limit 1600 ppt/600 found.
 - Information needed on sample preparation
 - QC samples submitted - number look good, but it's based on water, whereas the sample is oily matrix.
- Plan – schedule call with Kyla
 - KN to reach out to Kyla to schedule call to discuss the data
- Updates from OPP (RD), if any
 - RD scheduling call with Bayer on Permanone 3030
 - Kerry - Signed ACB review that looked at the method; rolling it into the CITAB review that, ultimately will likely allow Clarke to change to new containers.
- Updates from OPPT, if any
 - Ryan Schmidt
 - Folks working on an analysis of any TSCA rules apply to this situation. Update by the next meeting
- Updates on OECA
 - TSCA
 - Subpoena
 - Call between the chemists - OECA is waiting to see if there even is going to be a violation here. Likely not a violation (new chemicals); waiting for existing chemicals to get back to us
 - Determining whether there is role for OECA.
 - If it becomes a situation where there is a possibility of an OECA violation.
 - Joel Wolfe - OPPT DD
 - FIFRA
 - Nothing new - had a call with Clarke last week
 - Committed to drafting a management proposal for consideration (FIFRA SSURO or RCRA). Have hired a waste management company to help them. Haven't discussed many disposal method details. Focus on consolidation options (HQ - Wisconsin) - point of collection
 - Clarke IDing the universe of materials that will require management. - Drums provided for storage (not FIFRA labels; general hazard labeling).
 - Proposal - they're expecting something this week.
- Communication Efforts (OPS)
 - Bloomberg Interview – follow-up on definition of PFAS (kn)
 - Questions around inerts finder (indicated a clean up effort)
 - Questions around definition of PFAS
 - OPPT side on the definition. - Shamus to send what Cheryl provided on this; KN to add to these notes.
 - Sandra - more interest from States in Region 8
 - OPP attendance at the monthly call - method to provide updates. Next call is mid-April. April 14th
 - Check in next week - did FDA get what they needed?
- Any other updates/requests

Please review and address comments in the new link. It includes both the status of the OPP lab testing and the status of other collaborations/discussions.

PFAS in Pesticide Containers - Status - 02 18 2021 - with Comments for Team.docx

Microsoft Teams meeting

Join on your computer or mobile app

[Click here to join the meeting](#)

Or call in (audio only)

Ex. 6 Personal Privacy (PP)

[Find a local number](#) | [Reset PIN](#)

By participating in EPA hosted virtual meetings and events, you are consenting to abide by the agency's terms of use. In addition, you acknowledge that content you post may be collected and used in support of FOIA and eDiscovery activities.

[Learn More](#) | [Meeting options](#)

Participants

Notes

Created with OneNote.